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WA 8967 7/7/2016 4A

Region 10 RCRA Oversight Inspection Report

This report is divided into two parts. Part 1 is used during the actual inspection to record observations made in the field. Part 2 is used to evaluate the State inspection report relative to field observations. Both parts of the oversight inspection report are completed by the EPA oversight inspector. In the remarks column, N/A may be appropriate in some instances.

State I	nspectors:Jared N	<u> Mathey</u>		D	Tusp. 6/25/2015	_
		*:	PART 1	•	Insp. 6/25/2015	
I.	Facility Name: ID #:		E Hanford , ETF/L	ERF		
	Facility Activities:		Conditionally Exe	mpt Small C	Quantity Generator	
			Small Quantity Ge	enerator		
		<u>X</u>	Large Quantity Ge	enerator		3
		<u>X</u>	Treatment/Storage	e/Disposal Fa	acility	
			Transporter			
		<u>x</u>	Universal Waste		и (
			Used Oil			L
II.	Inspection Type:		CEI		O & M	
			CME	2	Lab Audit	
			Financial Records Review	p - 10.91	Compliance Monitoring Evaluation	
	i i		Non Financial Records Review	•	CDI	
		<u>x</u>	Other (specify):	CFI Focused	l on ETF/LERF activities only	
	Items to be Reviewed:	X	Full Scope		Limited Scope	
	Inspection Format:	<u>X</u>	Joint Visit	<u> </u>	Independent Visit	

III.	EPA Oversight Inspector:	Jack Boller			
	Organization:	R10 OAW/C	OCE_		_
	Telephone:	206 553-295	3		_
	Inspection Dates:	6/25/2015			_
IV.	Pre-Inspection Review:		Yes	No	<u>Remarks</u>
	Did the State inspector arrange the logistics of the inspection by assuring:	ne			
	a. facility actively op	erating?	_X_		
	b. EPA properly notif	fied?	_X_		
	2. Did the State transmit red documents according to the established schedule?	-	_X_	_	
	3. Was the inspector prepar conduct the inspection? I inspector should have pe information (permit appl previous inspection report waste types handled) and (safety and sampling)?	The rtinent ication, rts,	_x_	_	
	4. Did the inspector present appropriate identification advise the owner/operate purpose of the inspection briefly describe the agen	n and or of the n and	_x_		
VI.	Facility Information (Obse	rvations):		.2.	
	 Did the inspector demon or obtain knowledge of t processes and an underst its RCRA history? 	he facility	_X_		*
	2. Did the inspector conduction thorough walk-through conduction industrial processes and associated areas in the factorial conduction.	of the	x		

		<u>Y es</u>	<u>No</u>	Remarks
viola	the inspector fail to note any ations or improper waste lling activities?	_	_X_	
any l	the inspector fail to identify hazardous waste handling s not previously identified in rious reports or records?	_	_X_	
viola case (i.e.,	n identifying a potential ation, did the inspector initiate development procedures, gather detailed evidence to port the findings of violations)?	_X_		
requ and aisle avai com	the inspector check the sirements for preparedness prevention, including adequate espace, emergency equipment lability, and access to amunications during hazardous te handling operations?	_X_	- Ti	
perf acco proc	oplicable, was sampling formed by State personnel in ordance with standard operating cedures specified by the State for EPA?	****	- 12	NA
equi	s proper safety and sampling ipment used to perform the pling?			NA
own	s the inspector helpful to the her/operator by providing lanation of the regulations?	_X_		
que	s the inspector able to answer stions accurately or commit to vide answers at a later date?	_X_		
the	ne facility was permitted, did inspector determine compliance permit-specific conditions?	_X_		

		<u>Yes</u>	<u>No</u>	<u>Remarks</u>			
	12. Did the inspector perform an exit interview with the owner/operator summarizing the key findings of the inspection?	_X_	_				
	NOTE: The inspector should not make but should only discuss the findings.	e a findi	ing of vi	olation during the inspection			
VII.	Knowledge of the Regulations:						
	1. Was the inspector knowledgeable about hazardous waste regulations applicable to the facility?	_X_	_				
	2. Was the inspector aware of recent amendments to the regulations that may affect the conduct of the inspection?	_X_					
VIII.	Document Inspection (Review):						
	(Please note if review was performed prior to or during inspection.)						
	Did the inspector thoroughly review the following documents:						
	A. For Generators:	Yes	<u>No</u>	<u>Remarks</u>			
	• Inspection records for hazardous waste storage areas	_X_					
	Personnel training records	_X_					
	Contingency plan	_X_	_				
	Emergency equipment testing and maintenance records	_X_	- ¥				
	Waste analysis records	_X_	_				
	Manifests and exception reports	_X_	_				
	State annual and/or EPA biennial reports	_X_					
	Waste minimization plan		N				

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B.	<u>In</u>	addition, for TSDF's:	Yes	<u>No</u>	Remarks
	•	Part A permit application or final issued permit	_X_		Δ
	•	Part B application prior to permit issuance		8	_NA
	•	Operating record	_X_		
	•	Waste analysis plan	_X_		
	•	Inspection schedule	_X_		
	•	Closure and Post-Closure plan	_X_		
	•	Financial instruments	_		_NA
	•	Ground Water Monitoring/Reports	_X_		8 "
	•	Other information (treatment plant operations, internal correspondence)	_X_	_	
		<u>PA</u>	<u>RT 2</u>		
		INSPECTION R	EPOR'	T REVI	EW
Re	vie	w of Inspection Report:	<u>Yes</u>	<u>No</u>	Remarks
1.	co wi	d the inspector submit the mpleted inspection report thin the established workplan adlines?	_X_	_	
2.	fac	d the inspection report contain ctual observations rather than inion?	_X_		***
3.	it s vic	as the report accurate and did sufficiently document all the plations? Were the regulations terpreted correctly?	_X_	e	

			Yes	<u>No</u>	Remarks	
	4.	Did the report contain a discussion of changes that have occurred at the facility since the previous inspection?	_X_			
		If not, explain items that should have been included:				
	5.	Did the inspection report accurately reflect the EPA oversight inspector's observations?	x			
		If not, explain the differences:	_^_			
	6.	If non-compliance was identified, was the violator identified as either a Secondary Violator or a Significant non-complier?	_x_	_		
II.	Re	emarks:				
	1.	What is your overall assessment of the	inspect	ion and	the inspection report?	
		The inspector was well prepared an thorough and conducted in a profession clearly identified all observed compliants	al manı	ner. The	the facility. The inspection was report was detailed and accurate an	<u>d</u>
	2.	Describe recommendations that may in inspection report.	nprove (the qual	ity of the State inspection and/or the	

NOTE: Indicate whether the inspector is in need of additional training or is lacking a particular skill (e.g. hazardous waste sampling) needed for an adequate inspection.

No recommendations

3.	Comments on the inspection that could have a bearing on the State inspector evaluation (e.g., facility status under litigation, inadequate time allocated to perform inspection, complex industrial processes and waste handling practices, or numerous regulated units located on site).				